

# TIBC Budget Formulation Improvement Project

FINAL RECOMMENDATIONS REPORT

BY: THIELE STRATEGIES, TIBC FORMULATION WORK GROUP, & NCAI



National  
Congress of  
American  
Indians



Thiele Strategies

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## **INTRODUCTION**

### **Project Goal**

This aim of the budget formulation improvement project is to evaluate TIBC's current processes and develop recommendations to streamline and make more effective TIBC's work and final budget priorities.

### **Methodology**

#### **Interviews:**

In order to ensure that the TIBC Budget Formulation Improvement Project took into account a broad base of perspectives, the project manager conducted interviews over the phone, in-person, and over email with over two dozen individuals, including current TIBC representatives, work group representatives, current and former federal budget professionals, and government officials. This group included current and former government officials from the White House, OMB, DOI, HHS, & IHS.

#### **Feedback Review:**

The project manager conducted a review of 180 feedback forms submitted by tribes with their FY2020 Priorities survey. The feedback shed light on their impressions of the survey as well as their opinion of the TIBC process in general.

#### **Research:**

The project manager conducted research on a variety of recent and historical documents, including:

- TIBC meeting minutes
- TIBC recommendations
- Tribal Priorities over time
- TIBC Protocol
- TIBC regional reports

#### **Synthesis:**

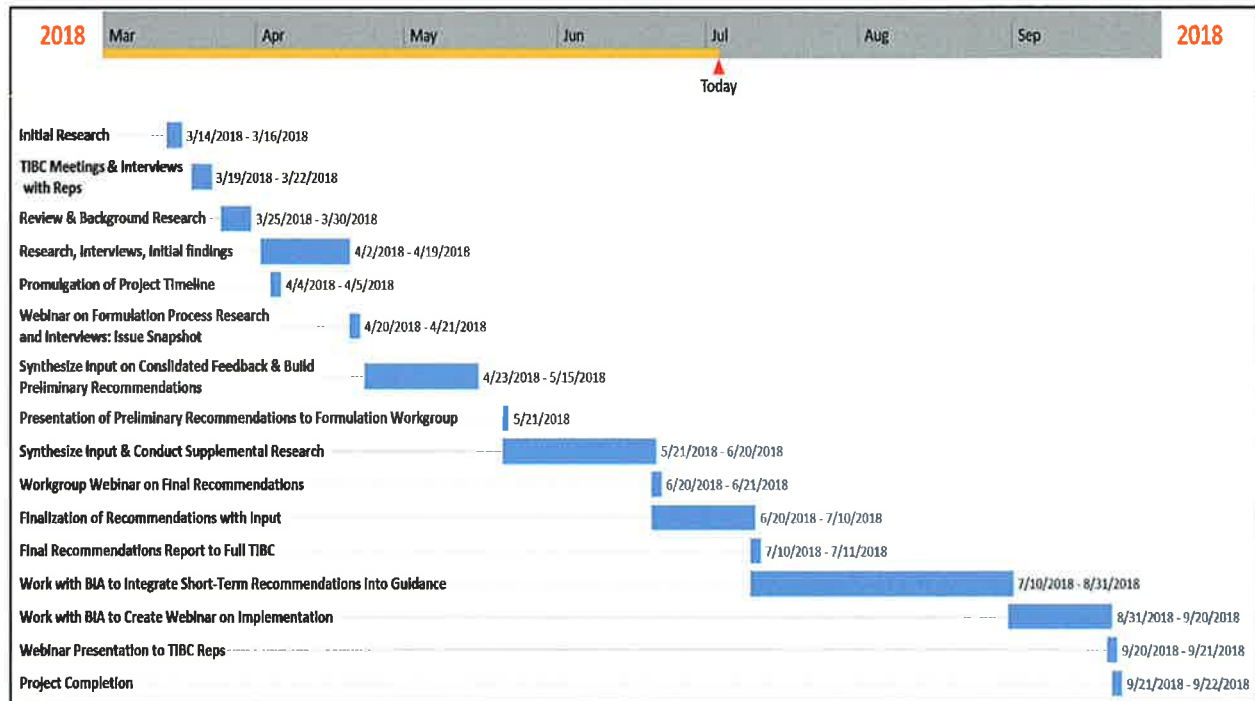
The project manager synthesized all information and formulated findings and recommendations with the oversight, review, and approval of the TIBC Budget Formulation Improvement Work Group and in coordination with NCAI.

#### **Process:**

- Interviewed past and present stakeholders, Reviewed Tribal Feedback, Conducted Research.
- Presented initial findings to the Formulation Work Group via Webinar.
- Collected Input and updated recommendations.
- Presented findings and preliminary recommendations to the Formulation Work Group at an in-person meeting in Washington, D.C.

- Collected input and updated recommendations.
- Presented Draft Final Recommendations to the Formulation Work Group via Webinar.
- Collected input and updated recommendations.
- Presentation of final Formulation Work Group recommendations to the full TIBC membership.

## Timeline



## GENERAL FINDINGS & RECOMMENDATIONS

### 1. Two-Way Vertical Communication

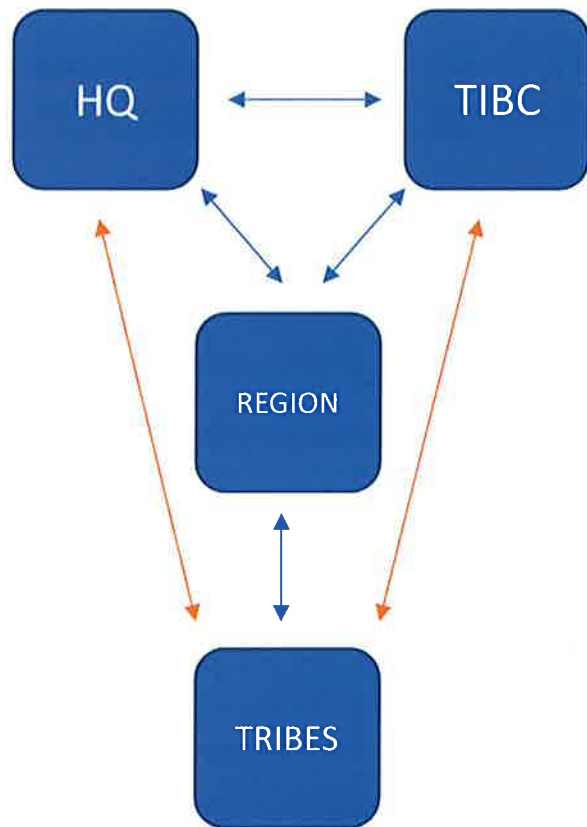
#### FINDINGS

<b>Federal</b>	<ul style="list-style-type: none"><li>• Not always consistent or timely information flow between HQ and regions.</li><li>• Lack of updates on appropriations process, President's Budget, etc.</li><li>• Regional budget reps sometimes conduct their work differently (i.e. some do not run in-person meetings, convene phone meetings).</li></ul>
<b>TIBC Tribal</b>	<ul style="list-style-type: none"><li>- Not always consistent or timely information flow between TIBC reps and tribes.</li></ul>

#### RECOMMENDATIONS

<b>Federal</b>	<ul style="list-style-type: none"><li>- Create a communications protocol for pushing appropriations news from HQ to regions and to tribes with a comparison to the tribal priorities (appropriations enactment, PBR release, CR enactment, etc). Include 1-2 all-tribes call/s to review the final national priorities as well as prior year priorities in relation to enacted levels.<ul style="list-style-type: none"><li>- NCAI should facilitate distribution of TIBC materials and recommendations by circulating budget updates, the meeting summary report, and the contact list of TIBC reps at the same time as BIA HQ/Region.</li></ul></li></ul>
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	<ul style="list-style-type: none"> <li>- NCAI should also facilitate an all-tribes call when TIBC finalizes its recommendations. This would be in addition to the calls hosted by TIBC federal and tribal partners.</li> <li>- Update the Budget Guidance to specify that each region will host at least one <i>in-person</i> budget meeting per formulation cycle.</li> <li>- Designate a federal POC in charge of confirming that media and communication are happening in compliance with these updated standards.</li> <li>- Consider creating a website to host information and trainings and/or a shared drive between HQ and the regions where all trainings, materials, etc, can be accessed easily.</li> </ul>
<b>TIBC Tribal</b>	<ul style="list-style-type: none"> <li>- Develop protocol on TIBC Tribal representatives' responsibility to communicate to tribes in their region  i.e. all Tribal TIBC reps should work with the intertribal organizations in their region to ensure that they are briefing their fellow leaders at least twice per year, once in the fall at budget formulation kickoff and once in the fall with rollout of the TIBC recommendations.</li> <li>- TIBC Tribal representatives should designate one member in charge of confirming that media and communication are happening in compliance with these updated standards.</li> </ul>



## 2. Formulation Methodology & Tribal Workload

### FINDINGS

<ul style="list-style-type: none"><li>• Need to specify if tribes are expected to formulate based on their interpretation of their priorities or if they should adjust based on the current political environment.</li><li>• Survey is too complicated &amp; cumbersome to complete in the time frame provided.</li><li>• Tribes perceive the survey as a repetitive annual exercise.</li><li>• Many tribes feel there are too many line items.</li><li>• Line items connection to program dollars received by tribes is sometimes unclear.</li><li>• Nature of line item funding unclear to many tribes (grant versus formula)</li><li>• Certain regions struggle with outreach (i.e. Alaska &amp; Pacific).</li></ul>	<ul style="list-style-type: none"><li>• Need more training for low-capacity tribes.</li><li>• Unclear how to appropriately reflect the different interests of Self Governance, 638, and Direct service tribes in the TIBC recommendations.</li><li>• Unclear understanding of unfunded trust obligations.</li><li>• Many small tribes don't have 10 programs that receive BIA funding &amp; struggle to identify top 10 issues. Other tribes prefer not to limit the number of programs they identify as priorities.</li><li>• Undefined process for increase/decrease scenario (this will be addressed at the end of the document).</li></ul>
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## RECOMMENDATIONS

### Survey

Recommendation: continue to utilize the preferred program survey process with the updates recommended in this section. The 2020 priority survey yielded largely positive feedback from the tribes.

#### Recommended Adjustments:

- **Nature of Priorities:** TIBC should clearly specify the underlying nature of the budget formulation priorities exercise by resolving the following question.

*Should tribes be adjusting their priorities to reflect the priorities of the current Administration or the current Congress? Or is this the role TIBC should play as the budget intermediary between tribes and federal officials?*

**Recommendation:** TIBC should not ask the tribes to do this, rather, it should be handled as a framing exercise during drafting of the final TIBC report.

- Each region should distribute the prior year's survey to each of their tribes who provided a prior year response when they distribute the updated survey.
- Do not require submission of success stories every year (but provide optional space).
- Make clear to the tribes that they are opining on their priorities 2-years out (what changes can they anticipate and adjust their priorities accordingly?)
- Re-assess the inclusion of certain line items and consolidate line items under the area headings.
- Add more information about the nature of different line items (i.e. grant, formula, etc) to enhance clarity of the program and tribal eligibility.
- Identify which programs are used by all 12 regions.

- Do not ask the regions to perform the 5% budget increase/decrease scenario. That should be handled at the central level and be based on a formula that reflects the priorities voiced by tribes (see section: Increase/decrease Scenario Options).
- TIBC and the tribes should investigate the historically prioritized 5-10 year BIA programs and develop a robust strategy to promote their importance to federal officials.
- Explore opportunities to directly negotiate with OMB or DOI Principals on the top priority programs.
- Do not require tribes to prioritize ten programs. Allow tribes to prioritize as many or as few programs as they feel is appropriate.

### **Needs of Tribes**

Pursue measures to understand the full needs of tribes. Compile a set of standards around each of the consistently top 5 BIA programs and ask tribes to compare those figures against their current services levels. Begin a process to identify need within the historically top 5 priority programs using available information/reports/studies.

Discontinue the categorization of tribes as Self Gov, 638, and Direct Service. It is an unclear designation of dubious value.

and/or

Hire a non-Federal actuary or researcher to do an assessment of the needs of tribes, beginning with the top priorities over time.

### 3. Buy-in & Participation

#### FINDINGS

<ul style="list-style-type: none"><li>• <b>Sporadic participation of TIBC Tribal Reps</b></li><li>• <b>Sporadic or poor participation from tribes in survey</b></li><li>• <b>Sporadic, low level, or poor participation from federal partners</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Misunderstanding of TIBC's role among members</b></li><li>• <b>Lack of tribal confidence in survey tool &amp; outcomes</b></li><li>• <b>Lack of understanding of budget process</b></li></ul>
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#### RECOMMENDATIONS

##### **Valuing the Process**

Need to ensure that all TIBC members value the formulation process by updating TIBC protocol around subcommittee membership, voting members, participants, quorums, and standards for TIBC representative/designee participation. Increased accountability would increase quality and consistency of participation.

- It would be advisable to reduce the number of meetings (recommend consolidating the March and May meetings into one March meeting).
- Each TIBC meeting should address logistics for the next meeting: which federal invites should attend and the primary goal of the next TIBC meeting.
- Need to ensure that the Subcommittees are reporting out only when they have a decision point that needs to be resolved by the full committee.
- Need to ensure that the goals and purposes of the non-standing subcommittees are clear. Once their short-term missions are achieved, they should be dissolved. (i.e. Ed Subcommittee was created to examine the budget impacts of BIE reorganization.)
- Need to ensure that marketing of TIBC to tribes is more consistent (interaction with the regional intertribals and taking advantage of regional gatherings). Regions should each

map the target events in their region and the manner of engagement that is to take place.

- Need to ensure that the tribes are involved in selection of their TIBC rep and feel a part of the process. Create a transparent process for selection of TIBC reps (nomination period, voting methodology, quorum of tribes). Distribute the list of TIBC reps along with contact info to the tribes with all blast emails from the federal TIBC representatives and NCAI.

### **Federal Participation**

- Ensure that federal partners make a commitment at the beginning of every budget year to provide the appropriate level of engagement at the TIBC meetings
- Co-chairs should consider submitting a letter at the beginning of the formulation process informing federal officials of the dates of the TIBC meetings and the level and timeframe of federal participation requested. The co-chairs should work with BIA to ensure that they receive an affirmative response from federal officials.
- Federal partners from each of the budget programs (especially the priority areas) should use TIBC as an opportunity to report-out on the programs, budget, etc.

#### 4. TIBC Protocol & Management

##### FINDINGS

<ul style="list-style-type: none"><li>• <b>TIBC subcommittees and workgroups struggle with clarity of mission and membership</b></li><li>• <b>TIBC has expanded beyond its original mandate</b></li><li>• <b>Unclear how subcommittee work feeds into budget recommendations</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Lack of dedicated support lead for TIBC</b></li><li>• <b>Sometimes Unclear Focus of full TIBC meetings</b></li><li>• <b>New members in need of orientation</b></li></ul>
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##### **New Member Orientation**

Recommend development of orientation program for new TIBC members. Create a training webinar for new members or returning members that offers an overview of the federal budget process, a historical accounting of the work of TIBC and TIBC Protocols, and any recent changes.

##### **Meeting Facilitation, Tracking, and Follow-Up**

- Recommend that TIBC identify coordination gaps that exist between the roles of TIBC, BIA and NCAI and expand NCAI contract (or request contracted assistance) to cover those gaps. (i.e. additional assistance to the TIBC Chairs and Subcommittee Chairs to plan meetings, track full subcommittee membership, and facilitate/coordinate the workload of the various TIBC components.)
- Ensure that the role of TIBC is articulated at the start of TIBC budget formulation process and meetings (i.e. Advisory body)
- Ensure that the budget process is clearly laid out for reps

## 5. Comprehensiveness of Budget Exercise

### FINDINGS

- **Pots of DOI money that tribes receive outside of BIA are not included in the line items**
- **BIA funding only covers a portion of the trust responsibility**
- **BIE and BIA processes are separate and not well coordinated**

### RECOMMENDATIONS

- Submit a request to the Department of the Interior that requests a whole-of-agency budget consultation that includes FWS, BLM, NPS, BOR, etc as part of the agency's reorganization effort.
- Develop a strategy for better coordination across agencies that provide a part of the federal trust responsibility. Submit a request to the White House, OMB, and DOI requesting that the White House Council on Native American Affairs establish a budget coordination subgroup headed by OMB that will coordinate with the various agency budget councils and budget staff and create a pathway for whole-of-government Indian Affairs budget consultation as part of the federal government reorganization.
- BIE Survey needs to be well coordinated with the BIA survey.

## **6. Impact of TIBC's recommendations**

### **FINDINGS**

- Message of connection between the budget recommendations and the enacted budget levels is not getting to the tribes.
- “Black hole” for information submitted with no clear follow-up mechanism
- Hill Engagement & Advocacy is lacking
- Engagement with federal officials is insufficient
- Strategy for communicating disconnect between appropriated amounts and TIBC's recommendations
- Unclear to tribes who TIBC is delivering the recommendations to

### **RECOMMENDATIONS**

- Develop an outreach and briefing strategy for federal officials. TIBC tribal co-chairs should immediately brief the new AS/IA on the work of TIBC and arrange for a consolidated or individual briefing with the heads of all relevant DOI departments.
- Clarify to tribes in the budget formulation guidance where their information will end up. Make clear to tribes that the AS/IA and the Deputy Secretary and Director of OMB will receive the information.
- Recommend that NCAI facilitate Hill engagement for TIBC co-chairs in conjunction with the final TIBC formulation meeting in DC.
- Recommend that NCAI host independent briefing calls on the outcomes of the TIBC process.

## PROCESS CHANGE OPTIONS

### I. **Move the annual TIBC budget formulation process to a bi-annual process.**

The FY2021 budget process would proceed as normal, and this new schedule would go into effect in FY 2022 (effectively skipping the FY 2022 budget formulation cycle).

Provide the opportunity for tribes to update their priorities during the non-formulation years if they wish. Significant changes submitted by tribes would then be issued in the form of a “skinny” interim priorities update report. TIBC would not be disbanded during the interim year, but workload for tribal reps would be significantly reduced and focused primarily around the work of the Budget Subcommittee on an as-needed basis. In the next 6-9 months, develop a plan for transitioning TIBC budget formulation to a bi-annual schedule.

This approach would increase the value and strength of TIBC recommendations, giving additional time to complete and update surveys and make the results of the exercise more anticipated by federal officials. This approach would also lessen the workload placed on tribes, would lessen the workload placed on federal officials.

### II. **Refocus and Narrow TIBC’s Mission.**

Develop a strategy to push the Secretary of the Interior to create a tribal advisory committee (STAC) through Secretarial Order. Move TIBC’s issue-area subcommittees, under that body. TIBC itself would become a subcommittee of the full STAC and the work of TIBC would focus around the responsibilities of the Budget Subcommittee and the Data Management Subcommittee.

This approach would lessen the bureaucratic nature of TIBC, reduce the workload for tribal participants and federal officials, and create a more efficient, effective, and focused mission that would help increase tribal rep and federal official buy-in and the strength of the formulation recommendations. This approach would also ensure that TIBC receives high-level Secretarial involvement in their budget formulation process, similar to the HHS STAC.

## INCREASE/DECREASE METHODOLOGY OPTIONS

### I. Weighted Allocations:

- a. Recommendation: TIBC should agree on an increase scenario formula that can easily be applied to future increase scenario exercises. An equitable and priorities-aligned approach would be to treat increases in the following manner, with the flexibility to adjust the final numbers based on budget subcommittee deliberation:

- i. 0-5% Increase scenario: hold all programs harmless, and provide for an inflation adjustment for CSC and TPA/TPA-like programs. Of the remaining increase amount, distribute it in a weighted and program size-adjusted manner across the top 5-10 priorities.

NOTE: It is strongly urged that the Budget Subcommittee consider this relatively simplistic approach to distributing increases as a starting point. An effective means of evaluating the real impact of these increases is to work with BIA to translate each program's recommended increase into concrete terms (i.e. a \$1.5 million increase to road maintenance will enable tribal nations to improve X miles of road, leading to safer driving conditions).

- ii. 5%+ Increase scenario: hold all programs harmless and increase for inflation and population growth. Of the remaining increase amount, distribute it in a weighted manner, among the top priority areas.

- II. Conduct a process to determine whether TIBC will engage in a decrease scenario exercise. Depending on the decision of the TIBC reps, create a formula for handling the decrease scenario.

## **IMPLEMENTATION:**

### How to Get from Recommendations to Action

Now-September 21<sup>st</sup>, 2018 (3 month period):

- Update 2021 BIA Budget Guidance and Survey
- Update TIBC Protocol with enhanced operating procedures and communications protocol, seek full TIBC approval.
- Determine with BIA and BIE how to distribute the BIE survey (audience, timing)
- Develop orientation program for new members
- Request whole-of-DOI budget consultation
- Finalize allocation strategy

By December 21<sup>st</sup>, 2018 (6 month period)

- Develop a standard approach for selection of TIBC reps from each region so that tribes feel that they are a part of the process and know their representative.
- Letter to federal officials confirming dates and appropriate participation.
- Identify and coordinate gaps that exist between the roles of TIBC, BIA and NCAI and expand NCAI contract
- Internal Federal Briefing Strategy
- NCAI should develop a Hill strategy & Hill engagement protocol & Briefing calls to tribes
- Develop Transition Strategy to a bi-annual budget process
- Request reorganization of TIBC into a new Secretary Tribal Advisory Committee. Submit proposal for contours of reorganization to Secretary of the Interior.

By March 21, 2019 (9 month period)

- Request that the White House Council on Native American Affairs establish a budget coordination subgroup headed by OMB that will coordinate with the various agency budget councils and budget staff and create a pathway for whole-of-government Indian Affairs budget consultation.

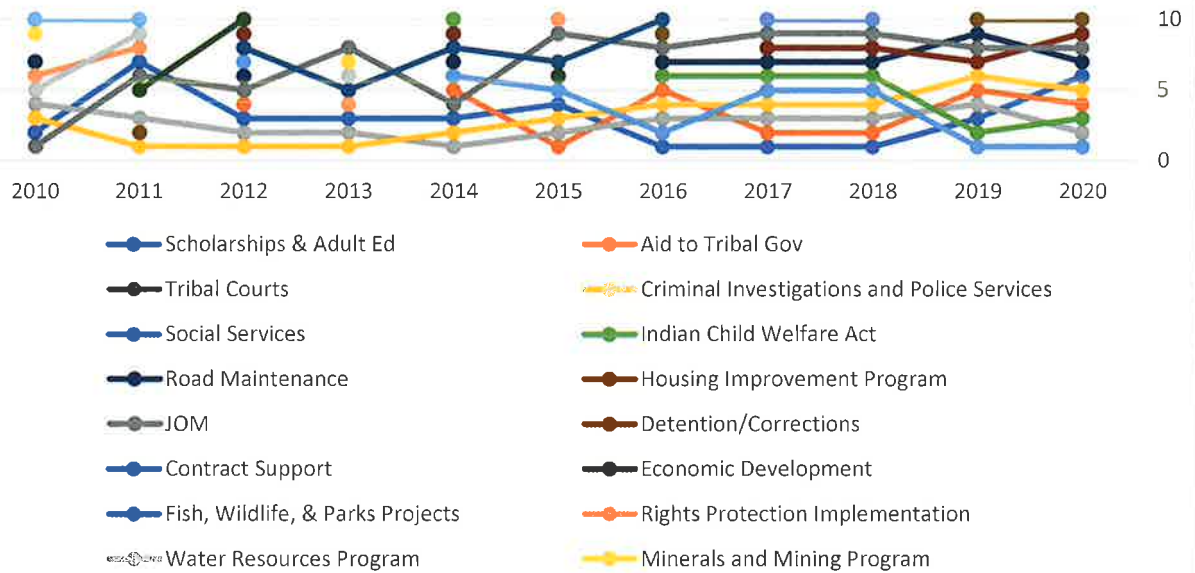
By June 21, 2018 (12 month period)

- Guidance to tribes on bi-annual change with instructions on how to take advantage of the option to update prior year's priorities.

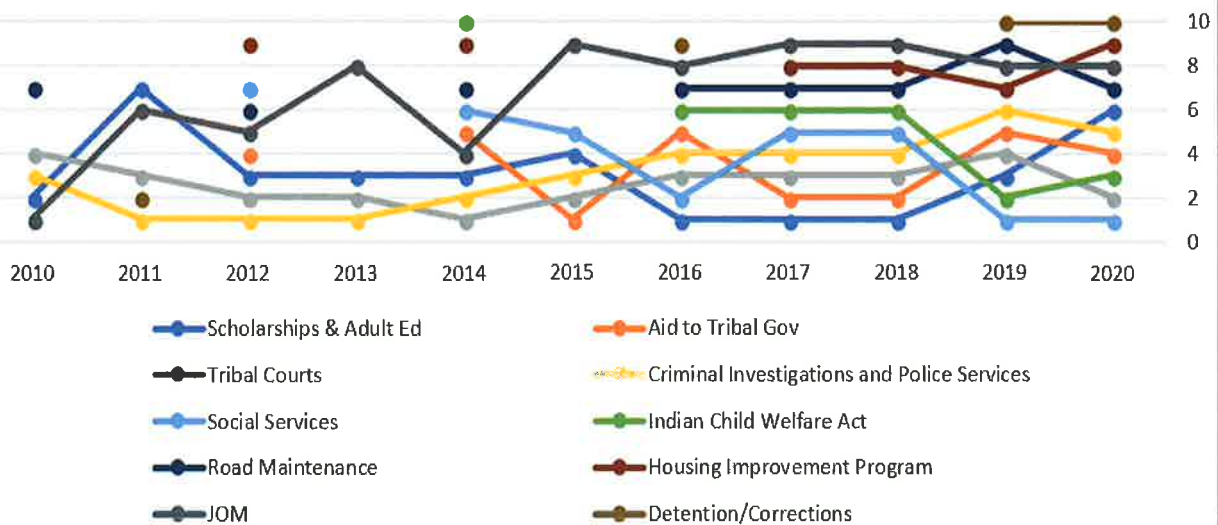
## **ADDENDUMS AND CHARTS**

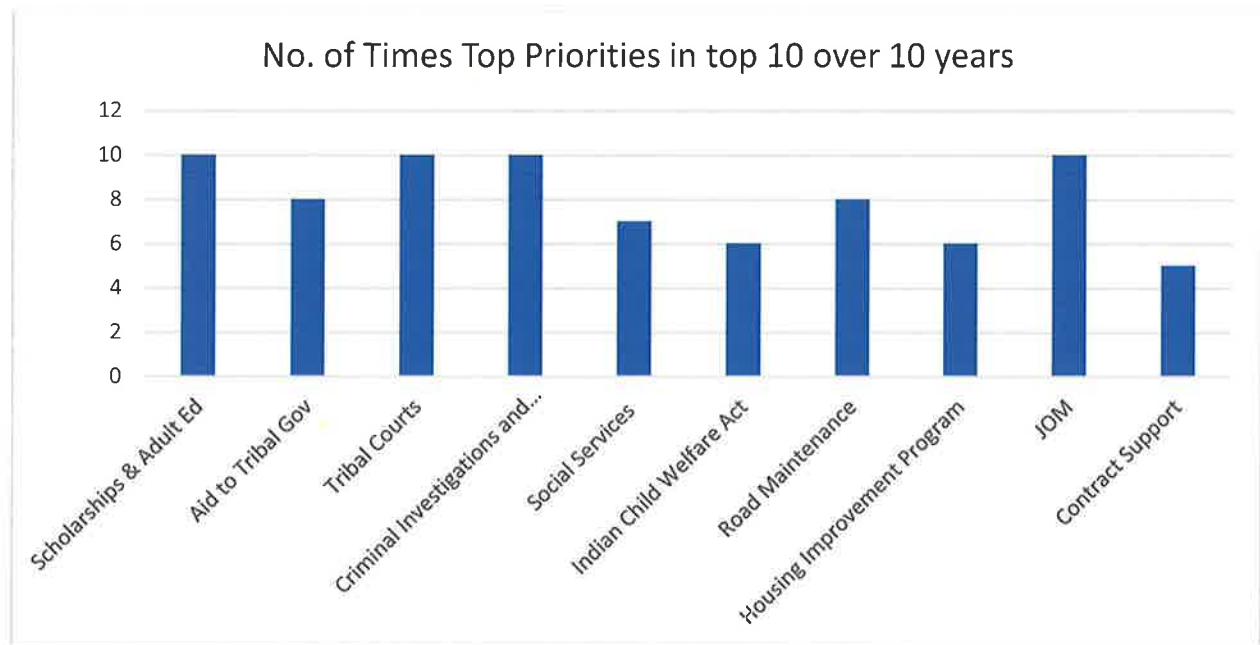
- I. CHART OF TOP PRIORITIES AND WHAT HAS CHANGED OVER TIME
- II. CHART OF DIFFERENT GROUPING OF LINE ITEMS WITH ADDITION OF "TYPES" OF FUNDING
- III. INCREASE SCENARIO CHARTS

## Top 15 National Tribal Priorities Over 10 Years



## Top 10 Priorities Over 10 Years





## CONSOLIDATION OF LINE ITEMS

<b>SELF DETERMINATION</b>
Aid to Tribal Government (TPA)
Consolidated Tribal Gov't Program (TPA)
Self Governance Compacts (TPA)
New Tribes (TPA)
Small & Needy Tribes (TPA)
<b>HUMAN SERVICES</b>
Social Services (TPA)
Welfare Assistance (TPA)
Indian Child Welfare Act (TPA)
Housing Program (TPA)
Human Services Tribal Design (TPA)
<b>TRUST - NATURAL RESOURCES MANAGEMENT</b>
Natural Resources (TPA)
Irrigation Operations & Maintenance
Rights Protection Implementation
Tribal Management/Development Program
Endangered Species
Tribal Climate Resilience
Integrated Resource Info Program
Agriculture Program (TPA)
Invasive Species
Forestry Program (TPA)
Forestry Projects
Water Resources Program (TPA)
Water Mgmt., Planning & PreDevelopment
Wildlife & Parks Program (TPA)
Fish, Wildlife & Parks Projects
<b>TRUST - LAND MANAGEMENT</b>
Trust Services (TPA)
Navajo-Hopi Settlement Program
Probate (TPA)
Land Title & Records Offices
RES Program (TPA)
RES Projects
LRI - Central

LRI - Regional
EQ Program (TPA)
EQ Projects
Alaskan Native Programs (TPA)
Rights Protection (TPA)
Water Rights Negotiations/Litigation
Litigation Support/Attny Fees
Other Indian Rights Protection
<b>PUBLIC SAFETY &amp; JUSTICE</b>
Criminal Investigations & Police Services
Detention/Corrections
Inspections/Internal Affairs
Law Enforcement Special Initiatives
Indian Police Academy
Tribal Justice Support
Law Enforcement Program Management
Facilities Operations & Maintenance
Tribal Courts (TPA)
Fire Protection (TPA)
<b>COMMUNITY &amp; ECONOMIC DEVELOPMENT</b>
Road Maintenance (TPA)
Job Placement & Training (TPA)
Economic Development (TPA)
Minerals & Mining Program (TPA)
Minerals & Mining Projects
Minerals & Mining Central Oversight
<b>INDIAN GUARANTEED LOAN PROGRAM</b>
Subsidies
Program Management
<b>EDUCATION</b>
ISEP Formula Funds
ISEP Program Adjustments
Education Program Enhancements
Tribal Education Departments
Student Transportation
Early Child & Family Development
Tribal Grant Support Costs
Facilities Operations

Facilities Maintenance
Juvenile Detention Center Education
Johnson-O'Malley Assistance Grants (TPA)
Haskell & SIPI
Tribal Colleges & Universities Supplements (TPA)
Scholarships & Adult Education (TPA)
Special Higher Education Scholarships
Science Post Graduate Scholarship Fund
Education Program Management
Education IT
<b>CONSTRUCTION</b>
EDUCATION CONSTRUCTION
Replacement School Construction
Replacement Facility Construction
Employee Housing Repair
Facilities Improvement & Repair
PUBLIC SAFETY & JUSTICE CONSTRUCTION
Facilities Replacement/New Construction
Employee Housing
Facilities Improvement & Repair
Fire Safety Coordination
Fire Protection
RESOURCES MANAGEMENT CONSTRUCTION
Navajo Indian Irrig. Project
Irrigation Projects-Rehabilitation
Engineering & Supervision
Survey & Design
Federal Power Compliance [FERC]
Safety of Dams
Dam Maintenance
OTHER PROGRAM CONSTRUCTION
Telecommunications Improvement & Repair
Facilities/Quarters Improvement & Repair
Construction Program Management

## EXAMPLE OF TRIBAL SELECTION

<b>SELF DETERMINATION</b>
Small & Needy Tribes (TPA)
Aid to Tribal Government (TPA)
New Tribes (TPA)
<b>HUMAN SERVICES</b>
Social Services (TPA)
Welfare Assistance (TPA)
Indian Child Welfare Act (TPA)
<b>TRUST - NATURAL RESOURCES MANAGEMENT</b>
Natural Resources (TPA)
Rights Protection Implementation
Forestry Program (TPA)
<b>TRUST - LAND MANAGEMENT</b>
RES Program (TPA)
EQ Program (TPA)
Probate (TPA)
<b>PUBLIC SAFETY &amp; JUSTICE</b>
Criminal Investigations & Police Services
Detention/Corrections
Tribal Courts (TPA)

## INCREASE SCENARIO METHODOLOGY COMPARED WITH 2020 METHODOLOGY

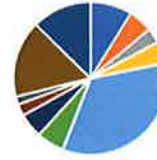
Priority	Programs	Increase Under FY2020 TIBC Methodology	% of the total Increase Allocated	Total FY17 Enacted Program Dollars	Program Size comparison	% Increase from FY17 enacted	Increase with Magnitude Adjustment	Increase \$ with Magnitude Adjuster rate	% Increase Comp. to FY17 E
1	Social Services	\$13,714,000	0.09	\$52,343,000	0.09	49%	0.13	\$19,782,464	38%
2	Tribal Court	\$8,057,000	0.05	\$30,753,000	0.05	76%	0.10	\$15,779,142	51%
3	ICWA	\$4,964,000	0.03	\$18,946,000	0.03	112%	0.08	\$13,057,384	69%
4	Aid to Tribal Government	\$7,104,000	0.05	\$27,118,000	0.05	69%	0.08	\$12,952,855	48%
5	CI & P	\$52,924,000	0.34	\$202,000,000	0.34	8%	0.22	\$34,687,168	17%
6	Scholarships & Adult Ed	\$9,113,000	0.06	\$34,783,000	0.06	41%	0.07	\$11,606,856	33%
7	Road Maintenance	\$7,940,000	0.05	\$30,307,000	0.05	39%	0.06	\$9,845,452	32%
8	JOM	\$3,871,000	0.02	\$14,778,000	0.02	64%	0.04	\$6,636,115	45%
9	Housing Improvement Program	\$2,544,000	0.02	\$9,708,000	0.02	13%	0.03	\$4,796,897	49%
10	Detentions/Corrections	\$25,285,000	0.16	\$96,507,000	0.16	5%	0.10	\$14,992,426	16%
11	Welfare Assistance	\$19,590,000	0.13	\$74,773,000	0.13	3%	0.07	\$10,970,241	15%

New Method



- Social Services
- Tribal Court
- ICWA
- Aid to Tribal Government
- CI & P
- Scholarships & Adult Ed
- Road Maintenance
- JOM
- Housing Improvement Program
- Detentions/Corrections
- Welfare Assistance

2020 Method



- Social Services
- Tribal Court
- ICWA
- Aid to Tribal Government
- CI & P
- Scholarships & Adult Ed
- Road Maintenance
- JOM
- Housing Improvement Program
- Detentions/Corrections
- Welfare Assistance